

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Implementation of the Subscriber Carrier)
Selection Changes Provisions of the)
Telecommunications Act of 1996)
)
Policies and Rules Concerning)
Unauthorized Changes of Consumers' Long)
Distance Carriers)

CC Docket No. 94-129

RECEIVED

APR 16 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF MEDIAONE

Pursuant to the *Public Notice*,¹ MediaOne Group, Inc. (MediaOne) submits these Comments on the *Joint Petition*² and *Joint Motion*³ filed in this proceeding by MCI WorldCom and others. The *Joint Petition* seeks a waiver of certain of the Commission's rules to facilitate the creation of an industry-sponsored "third-party administrator" (TPA) to resolve slamming complaints and administer the compensation between carriers when slamming occurs. The *Joint Motion* requests an extension of the effective date of the slamming liability rules (or, alternatively, a stay of those rules) to give the industry time to get the TPA up and running. MediaOne supports both the *Joint Petition* and the *Joint Motion*.

By creating a TPA, the industry can resolve the greatest concerns with the slamming liability rules. Those rules will frequently put an allegedly unauthorized carrier in the position of relying on a competitor (the authorized carrier) to resolve a slamming complaint against it.

¹ DA 99-683 (April 8, 1999).

² *Joint Petition for Waiver*, CC Dkt. No. 94-129 (MCI WorldCom, et al., March 30, 1999).

³ *Joint Motion for Extension of Effective Date of Rules or, In the Alternative, For a Stay*, CC Dkt. No. 94-129 (MCI WorldCom, et al., March 30, 1999).

No. of Copies rec'd 074
List A B C D E

Under the rules, the authorized carrier finds itself in the middle of a dispute between its customer and a competitor. By turning these matters over to a disinterested TPA, the industry will ensure better, more consistent investigations of slamming complaints and fairer results.

The industry proposal would also simplify the reimbursement procedures when slamming does occur, thus simplifying the administration of the rules for all concerned.

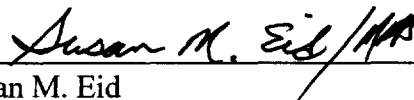
MediaOne believes the industry proposal will make compliance with the new liability rules more efficient and fair for all participating carriers, and it will provide consistent, neutral administration of the liability process for consumers. The Commission should expeditiously grant the requested waiver so the industry can get on with implementing the TPA.

The Commission should also grant the *Joint Motion*. Though a TPA is plainly the best way to administer the liability rules, implementing it will take some time. Giving the industry additional time will enable participating carriers to devote their full attention to getting the TPA in place as quickly as possible.

For the reasons stated, MediaOne urges the Commission to grant the *Joint Petition* and the *Joint Motion*.

Respectfully submitted,

MEDIAONE GROUP, INC.

A handwritten signature in dark ink, appearing to read "Susan M. Eid" followed by a stylized flourish or initials.

Susan M. Eid
Richard A. Karre
1919 Pennsylvania Avenue, N.W., Suite 610
Washington, DC 20006
(202) 261-2000

April 16, 1999

DCDOCS: 148113.1 (36@901!.doc)

CERTIFICATE OF SERVICE

I, Margaret Davis, do hereby certify that copies of the foregoing MediaOne Group, Inc. Comments in response to the Joint Petition for Waiver and Joint Motion for Extension of Effective Date of Rules in the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996 and the Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers were sent, on this 16th day of April, 1999, via first-class mail, postage pre-paid, or hand delivery(*):

Chairman William E. Kennard*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8B201
Washington, D.C. 20554

Glen Reynolds*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 5-A847
Washington, D.C. 20554

Commissioner Harold Furchgott-Roth*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8A302
Washington, D.C. 20554

Alexander P. Starr*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 5-C812
Washington, D.C. 20554

Commissioner Michael K. Powell*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8A204
Washington, D.C. 20554

Judy Boley*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8A1836
Washington, D.C. 20554

Commissioner Susan P. Ness*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8B115
Washington, D.C. 20554

Kathy Brown*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 8-B201E
Washington, D.C. 20554

Anita Cheng*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 5-C739
Washington, D.C. 20554

Dorothy Attwood*
Chief, Enforcement Division
The Portals
445 12th Street, SW, Room 5A848
Washington, D.C. 20554

Kimberly Parker*
Federal Communications Commission
The Portals
445 12th Street, SW, Room 5-C827
Washington, D.C. 20554

Mark C. Rosenblum
Peter H. Jacoby
AT&T Corporation
295 North Maple Avenue
Basking Ridge, NJ 07920

Leon Kestenbaum
Jay C. Keithley
Michael B. Fingerhut
Sprint Corporation
1850 M Street, N.W., Suite 1100
Washington, D.C. 20036

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
Telecommunications Resellers Association
1620 I Street, N.W., Suite 701
Washington, D.C. 20006

Genevieve Morelli
Senior Vice President of Government
Affairs & Senior Associate General Counsel
Qwest Communications Corporation
4250 North Fairfax Drive
Arlington, VA 22203

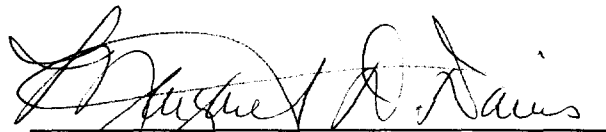
ITS*
1231 20th Street, NW
Washington, D.C. 20036

Mary L. Brown
MCI WorldCom, Inc.
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006

Carol Ann Bischoff
Robert M. McDowell
Competitive Telecommunications Association
1900 M Street, NW, Suite 800
Washington, D.C. 20036

James M. Smith
Vice President
Excel Telecommunications, Inc.
1133 Connecticut Avenue, NW
Suite 750
Washington, D.C. 20036

Michael J. Shortley, III
Senior Attorney & Director
Regulatory Services
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646


Margaret Davis